

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America

v.

Michael Shiferaw

Defendant(s)

FILED
DEC -6 2018
SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
Case No.

3 18 71726

SK

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 23, 2018 in the county of San Francisco in the
Northern District of California, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2113(a)

Bank robbery

This criminal complaint is based on these facts:

Please see the attached affidavit of FBI Special Agent Jeffrey Kim.

☒ Continued on the attached sheet.

Approved as to form by AUSA Joseph E. Springsteen

Complainant's signature

FBI Special Agent Jeffrey Kim

Printed name and title

Sworn to before me and signed in my presence.

Date:

12-6-18

Judge's signature

City and state: San Francisco, California

Hon. Sallie Kim, US Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jeffrey Kim, being duly sworn, hereby depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation ("FBI") and have been so employed since late 2013. I am presently assigned to the San Francisco Office of the FBI, where I investigate criminal violations of federal law, with a focus on violent crimes and bank robberies. I have received training at the FBI Academy in Quantico, Virginia, to include training on criminal procedure, search and seizure, violent crimes, and gang organization. During the course of my career with the FBI, I have participated in numerous investigations involving bank robberies and gang-related crimes and in the execution of numerous arrests and search warrants relating to such investigations.

2. This affidavit is made in support of an application for a criminal complaint against Michael Asfaw SHIFERAW, (hereafter referred to as "MICHAEL SHIFERAW") for Bank Robbery violation of 18 U.S.C. § 2113(a). In particular, as set forth in further paragraphs below, there is probable cause to believe that on November 23, 2018, at approximately 3:28 p.m., MICHAEL SHIFERAW entered the Citibank located at 2198 Chestnut Street, San Francisco, California, within the Northern District of California, and displayed a demand note on an iPhone to the teller, his sister MERON SHIFERAW, which purportedly threatened a gun and demanded cash. MERON SHIFERAW placed an unusually large quantity of cash directly into a white plastic bag carried by MICHAEL SHIFERAW. This affidavit establishes probable cause to arrest MICHAEL SHIFERAW at this time. The investigation into MERON SHIFERAW continues.

3. MICHAEL SHIFERAW then fled with \$21,100 in United States currency that belonged to Citibank. At the time of the robbery, the bank and its deposits were insured by the Federal Deposit Insurance Corporation ("FDIC").

4. Citibank's security cameras captured and recorded the robbery. During the incident, MICHAEL SHIFERAW wore distinct clothing, utilized a white plastic bag, and did not wear any facial disguise. As a result, Citibank's security cameras were able to capture and record MICHAEL SHIFERAW's entire outfit, facial hair, and a portion of the side of his face. On the day of the robbery, approximately 3.5 hours prior to the incident, security camera footage retrieved from MICHAEL SHIFERAW's apartment complex captured MICHAEL SHIFERAW departing the apartment complex wearing the identical outfit – including distinctive shoes, jeans, a camouflage pattern hooded sweatshirt, and hat – worn during the bank robbery. Furthermore, approximately 45 minutes after the robbery, the same security camera captured MICHAEL SHIFERAW returning to the apartment complex wearing the same distinctive shoes and pants, and carrying the white plastic bag used during the robbery. Apart from the identical items of clothing, the robber's race, age, sex, general height, facial hair, hair, and build appear identical to that of MICHAEL SHIFERAW.

5. The facts and information set forth in this affidavit are based on my personal observations, my training and experience, and, as specifically attributed below, information obtained from law enforcement officers and witnesses. To the extent that any information in the affidavit is not within my personal knowledge, it has been made available to me through reliable law enforcement sources, and I believe such information to be true. This affidavit is made for the sole purpose of demonstrating probable cause for the issuance of the requested complaint and arrest warrant and does not purport to set forth all my knowledge of, or investigation into, this

matter. In addition, where I report information I learned from others or from reviewing documents and reports prepared by others, such information is recounted in sum and substance and in relevant part.

APPLICABLE STATUTES

6. Title 18 U.S.C. § 2113(a) provides in relevant part that: “Whoever, by force and violence, or by intimidation, takes, or attempts to take, from the person or presence of another, or obtains or attempts to obtain by extortion any property or money or any other thing of value belonging to, or in the care, custody, control, management, or possession of, any bank, credit union, or any savings and loan association ... [s]hall be fined under this title or imprisoned not more than 20 years, or both.”

STATEMENT OF PROBABLE CAUSE

7. On November 23, 2018, I received notice of a bank robbery which occurred that day at the Citibank located at 2198 Chestnut Street, San Francisco, California. I subsequently responded to the scene of the robbery and conducted witness and victim interviews. Additionally, I reviewed still images from Citibank’s security cameras, which captured the entire bank robbery and the subject, as well as spoke with the San Francisco Police Department officers who responded to the robbery.

8. On November 23, 2018, at approximately 3:28 p.m., one light skinned black male (hereafter referred to as “the robber”), approximately 5’9” to 5’10”, late 20s to early 30s, with a medium build, a full beard, longer black hair, and wearing a green camouflaged hooded jacket, zipped up with the hood worn down, a black colored San Francisco Giants baseball cap with a grey bill worn forward, loose fitting light colored blue jeans with distinct back pockets, and black colored athletic shoes with a silver tag on the front laces, entered the Citibank from its

main entrance. Once inside the bank, the robber approached the teller's station. The robber then displayed a demand note on an iPhone that, according to the teller, threatened a gun and demanded cash. The teller placed mostly large denomination bills from her second teller cash drawer directly into a white plastic bag held by the robber. The robber then took the cash and departed from the bank's main entrance. Citibank's security cameras captured and recorded the robbery including the robber's entire outfit, facial hair, and a portion of the side of his face. The robber did not wear any facial disguise.

9. According to the victim teller ("MERON SHIFERAW"), on the day of the robbery, MERON SHIFERAW was the only teller working when the robber approached her station. Once at her station, the robber showed MERON SHIFERAW an iPhone which, according to her, displayed a demand note which stated words to the effect of "I have a weapon, I want all the money from all the drawers." MERON SHIFERAW then unlocked the drawers. The robber then purportedly stated something the effect of "hurry up" or "be quick" while holding a white plastic bag. MERON SHIFERAW grabbed a stack of cash from her second drawer, and put it directly into the robber's plastic bag and turned around to grab more cash. According to MERON SHIFERAW, the robber then said something to the effect of "don't do anything stupid just walk to the bathroom." The robber then departed the bank. After the robber departed, MERON SHIFERAW stated that she notified a co-worker and then activated the alarm. MERON SHIFERAW described the robber as a light skinned black male, mid 30s, approximately 6'0" to 6'1" wearing a black baseball cap, reading glasses, a yellow and green camouflage jacket with the hood worn down, and possibly wearing black denim jeans.

10. In total, the robber took approximately \$21,100 in United States currency from Citibank.

11. On November 23, 2018, I interviewed MERON SHIFERAW immediately following the robbery. Based upon my training and experience and through discussions with law enforcement partners with experience in bank robbery investigations, it is extremely rare for a victim teller to store such a large amount of cash in one teller drawer and for them to retrieve and provide it immediately to a robber following a demand note robbery. While bank train tellers to provide cash in response to a demand note from a robber, tellers typically take the cash from their primary drawer that contains lower denomination bills. In my experience, it is extremely rare for a bank robber to obtain such a large amount of money with only a demand note, without escalating to additional threats or violence.

12. Suspecting MERON SHIFERAW may have been involved with the robbery, I conducted law enforcement and California Department of Motor Vehicle checks on her. The checks also identified her brother, MICHAEL SHIFERAW, date of birth February 19, 1990, residing at 950 Cabrillo Street, Apartment 3, San Francisco, California. MICHAEL SHIFERAW closely resembled the robber's race, age, sex, general height, and build. In particular, both the robber and SHIFERAW shared a full facial beard and longer black hair. Criminal history checks on MICHAEL SHIFERAW revealed past burglary, robbery, and drug related arrests.

13. The following week, I identified and contacted the property company that manages the 950 Cabrillo Street apartment complex where MICHAEL SHIFERAW was believed to reside. In particular, I spoke and met with the Assistant Manager who oversees the apartments for 950 Cabrillo Street. The manager confirmed that MICHAEL SHIFERAW currently resides at 950 Cabrillo Street, Apartment #3, and stated that he was four months behind in rent. As a result, the property company was planning to serve MICHAEL SHIFERAW an eviction notice for failing to pay rent. Additionally, the property company received complaints

from the residents of 950 Cabrillo Street who suspected that MICHAEL SHIFERAW was dealing drugs out of his apartment. As recently as November 2018, the Assistant Manager was in telephonic contact with MICHAEL SHIFERAW, who continues to reside at Apartment #3.

14. That same day, the Assistant Manager met me and another FBI Special Agent and voluntarily retrieved security camera footage which covers 950 Cabrillo Street's entrance/exit lobby area. The Assistant Manager then escorted both of us to the security camera console and assisted in the downloading of security camera footage capturing the 950 Cabrillo Street entrance/exit lobby area from the early morning to evening of November 23, 2018. I subsequently reviewed the security camera footage and observed the following. On the day of the robbery, approximately 3.5 hours prior to the incident, the apartment's security camera captured and recorded MICHAEL SHIFERAW departing the apartment complex wearing the identical outfit worn during the bank robbery MICHAEL SHIFERAW – in particular the same green camouflaged hooded jacket, a black colored baseball cap with a grey bill worn forward, loose fitting light colored blue jeans with distinct back pockets, and black colored athletic shoes with a silver tag on the front laces. Identically to the robber, MICHAEL SHIFERAW had a full beard and longer black hair. Furthermore, approximately 45 minutes after the robbery, MICHAEL SHIFERAW was captured on security camera returning to his apartment complex wearing shoes and pants identical to those worn by the robber, and carrying the white plastic bag used during the robbery. Although MICHAEL SHIFERAW wore a different sweatshirt on his return, the other items of clothing are distinctive.

REQUEST TO SEAL

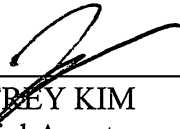
15. I believe that should the contents of the Affidavit and the requested arrest warrant be made public, it would jeopardize this investigation and any personnel assigned to or

cooperating in this investigation. Should the existence of the Affidavit and the arrest warrant be disclosed, members and associates of the organization described above would likely be prompted to destroy or hide evidence, notify co-conspirators, or flee from prosecution. Therefore, for the foregoing reasons, and because this is an ongoing investigation, I respectfully request that this Affidavit and the requested arrest warrant be sealed until further order of the Court.

CONCLUSION

16. Based upon the comparison of the Citibank security camera footage to the video footage obtained from his apartment complex at 950 Cabrillo Street on the day of the robbery, I believe that MICHAEL SHIFERAW is the bank robber. For this reason, there is probable cause to believe that MICHAEL SHIFERAW robbed the Citibank located on Chestnut Street in San Francisco.

Dated: 12-6-18



JEFFREY KIM
Special Agent
Federal Bureau of Investigation

Subscribed to and sworn to before me this 6 day of December, 2018



HON. SALLIE KIM
United States Magistrate Judge